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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	
)	Case No.: 2:14-cr-00178-JAD-GWF
Plaintiff,)	
)	STIPULATION TO CONTINUE MOTION
vs.)	DEADLINES AND HEARING
)	(7th request)
IAN PINCOMBE,)	
)	
Defendants.)	

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden, United States Attorney; Allison L. Herr, Special Assistant United States Attorney, counsel for the United States of America and Jennifer Waldo, Esq., counsel for defendant Ian Pincombe, that time for the filing of the Defendant Reply shall be extended to August 10, 2015, and hearing currently scheduled for July 27, 2015 at 1:30 pm be continued for a period of 30 days.

This Stipulation is entered into for the following reasons:

1. The parties are in the midst of plea negotiations, which if successful would obviate the need for the hearing. These negotiations however have been complicated by certain disputes over the factual averments to which the Defendant will be pleading requiring time to research and negotiate language for the same.

2. The additional time requested is not sought for the purposes of delay, but to allow counsel sufficient time to complete negotiations.

3. The parties agree to the continuance.

4. The defendant is in custody and does not object to a short continuance.

5. Denial of this request could result in a miscarriage of justice. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code §3161(h)(7)(A), considering the factors under Title 18, United States Code §3161(h)(7)(B) and § 3161(h)(7)(B)(iv).

6. This is the seventh request to continue the hearing.

DATED this 23rd day of July, 2015.

DANIEL G. BOGDEN
United States Attorney

JENNIFER WALDO
Attorney for Defendant

By: /s/ Allison Herr
ALLISON L. HERR
Special Assistant United States Attorney

By: /s/ Jennifer Waldo
JENNIFER WALDO

